

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VINCENT DOLAN, Individually and on )  
behalf of himself and all others similarly ) Case No. 7:21-cv-05813-VB  
situated, )  
)  
)  
Plaintiff, )  
v. )  
)  
)  
UNITED SERVICES AUTOMOBILE )  
ASSOCIATION, )  
)  
)  
Defendant. )

CHRISTINE MAPES, Individually and on	)	
behalf herself and all others similarly	)	
situated,	)	Case No. 7:21-cv-07853-VB
	)	
Plaintiff,	)	
v.	)	
	)	
UNITED SERVICES AUTOMOBILE	)	
ASSOCIATION,	)	
	)	
Defendant.	)	

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION  
FOR CONSOLIDATION PURSUANT TO FED. R. CIV. P. 42 AND APPOINTMENT OF  
CO-LEAD INTERIM CLASS COUNSEL PURSUANT TO FED. R. CIV. P. 23(g)**

**PLEASE TAKE NOTICE** that Plaintiffs Vincent Dolan and Christine Mapes will move this Court on a date and time to be designated by the Honorable Vincent L. Briccetti, United States District Judge at the United States District Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, for the entry of the attached [Proposed] Order (1) consolidating *Dolan. v. United Services Automobile Association*, 7:21-cv-05813 (the “*Dolan Action*”) and *Mapes v. United Services Automobile Association*, 7:21-cv-07853 (the

“*Mapes* Action”); (2) appointing Gainey McKenna & Egleston, Carlson Lynch LLP, and Lowey Dannenberg, P.C., as Co-Lead Interim Class Counsel; and (3) granting such other relief as the Court may deem appropriate.

Please take further notice, that, in support of this motion, Plaintiffs rely on this Notice of Motion, the accompanying Memorandum of Law, the firm resumes of Gainey McKenna & Egleston, Carlson Lynch LLP, and Lowey Dannenberg, P.C., and all other papers and proceedings had herein.

Dated: September 30, 2021

Respectfully submitted,

By: /s/ Thomas J. McKenna

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*Proposed Co-Lead Interim Class Counsel*